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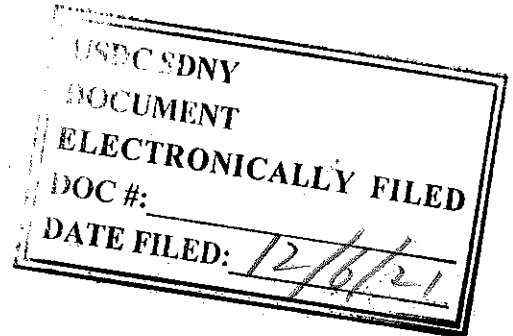
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December 1, 2021

BY ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED



Re: **United States v. Ofer Abarbanel**
21 Cr. 532 (LAK)

Dear Judge Kaplan:

We represent Ofer Abarbanel in the above-referenced matter. We write to respectfully request an adjournment of the defense motions deadline of December 23 for the reasons set forth below. As the Court is aware, we were appointed pursuant to the Criminal Justice Act in late September 2021.

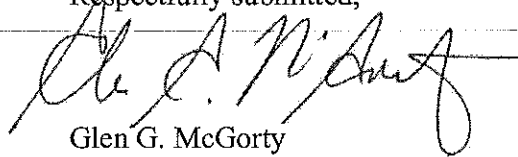
We respectfully request an adjournment of the December 23 defense motions deadline for two reasons. First, we continue to work with the Government to obtain, process, and begin to review the voluminous discovery in this case. Despite the parties' best efforts, including timely production of Rule 16 materials by the Government and diligent work with the National Litigation Support Team, the receipt and processing of the electronic discovery is not yet complete, and we have been unable to complete a meaningful review to inform what, if any, motions should be made. In addition, we have engaged with the Government on broader discussions regarding the case and those will continue in parallel to the continued discovery production. Both will take through the end of this year. For those reasons, we respectfully request that the Court adjourn the December 23 defense motion deadline.

In light of the significant volume of discovery and the complexity of this matter, we further respectfully request that, rather than reset the deadline, the Court instead set the matter for a status conference in late January which will allow the parties the additional time needed to ensure all Rule 16 materials have been produced, for the defense to conduct a review of those materials, and for the parties to continue their broader discussions on the matter.

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We have conferred with the Government and it has no objection to this request. Should the Court require any additional information, please do not hesitate to contact the undersigned at Your Honor's convenience.

Respectfully submitted,



Glen G. McGorty

Cc: Allison Nichols, Esq.
Assistant United States Attorney
Southern District of New York

*All existing deadlines
extended by 28 days*

SO ORDERED



LEWIS A. KAPLAN, USDJ

12/6/21